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August 24, 2020

VIA EMAIL

Adam Slater, Esq.
Mazie Slater Katz & Freeman, LLC
103 Eisenhower Parkway
Roseland, NJ 07068
aslater@mazieslater.com

Re: **In re Valsartan, Losartan, and Irbesartan Products Liability Litigation**
Civ. No. 19-2875 (D.N.J.)

Counsel:

This responds to Plaintiffs' letter dated August 17, 2020, wherein Plaintiffs assert "apparent and potential deficiencies in the ZHP Defendants' productions," and request custodial productions data from three additional ZHP employees.

Plaintiffs' request for privilege logs from the ZHP Defendants is misplaced because the ZHP Defendants have not produced any document families containing information that has been redacted or withheld for privilege.

Plaintiffs' request for additional information in the "Source(s)" column of the production indexes is not consistent with the requirements of the ESI Protocol. Nevertheless, I understand that my colleague Joe Ferretti and Behram Parekh, who is on the PEC, have come to an understanding about this request, and the ZHP Defendants will endeavor to provide additional information in the "Source(s)" column pursuant to that understanding.

Plaintiffs' request related to the prioritization of documents is premature. The ZHP Defendants are making and have made considerable efforts to prioritize the production of each of the categories of information that Plaintiffs have asked to be prioritized. Those efforts continue.

Duane Morris

Adam Slater, Esq.
August 24, 2020
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The ZHP Defendants have produced information pertaining to testing and the “Novartis/ZHP Issue,” and expect to produce more in the coming weeks on a rolling basis.

Lastly, the ZHP Defendants reject Plaintiffs’ request for two of the three identified additional custodians. One of the additional custodians requested is already a document custodian. “Karen Xu” is “Mi Xu,” who is a document custodian. Plaintiffs have not demonstrated good cause for expanding the Court’s order granting Plaintiffs eighty-one (81) ZHP-related custodians with respect to the two other ZHP employees you have identified. If Plaintiffs’ persist in requesting their custodial files, we should arrange a meet and confer to discuss your bases for these requests.

Sincerely,

/s/ Seth A. Goldberg

Seth A. Goldberg

cc: Plaintiffs’ Executive Committee (*via email*)
Counsel for Defendants Teva, Mylan, Aurobindo, Torrent, and Hetero Labs (*via email*)